

**GOVERNMENT OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR

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IN RE:

MANEJO DEL MANTENIMIENTO Y
REPARACIONES DE LAS UNIDADES
DE GENERACIÓN UTILIZADAS POR LA
AUTORIDAD DE ENERGÍA ELÉCTRICA
DE PUERTO RICO PARA SUPLIR
SERVICIO ELÉCTRICO

CASE NO.: NEPR-MI-2021-0014

SUBJECT: Motion to Submit Quarterly Report
on Consumables, Spare Parts, and Capital Spare
Parts for the First Quarter of Fiscal Year 2026

**MOTION TO SUBMIT QUARTERLY REPORT ON CONSUMABLES, SPARE PARTS,
AND CAPITAL SPARE PARTS FOR THE FIRST QUARTER OF FISCAL YEAR 2026**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On June 16, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“June 16th Resolution”), whereby it established Docket No. NEPR-MI-2021-0014 to remain informed about the operating state of the Electric Power System and for filing of material related to the maintenance and repair of PREPA’s generation fleet. The Energy Bureau noted the obligations of Genera pursuant to Section 4.2 of the LGA OMA to report on the available inventory of Consumables, Spare Parts, and Capital Spare Parts for each Legacy Generation Asset which could be used for offsetting other costs and

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (defined in the LGA OMA), and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

expenses.² Additionally, in this docket, the Energy Bureau required Genera to file its June 1, 2023, Recommendation Letter and any future recommendations mandated by Section 4.2(j) of the LGA OMA, following the same submission timelines specified in that section.

2. On December 12, 2023, Genera filed a document titled *Motion to Submit Amended Response to Resolution and Order Dated November 29, 2023* (“December 12th Motion”), through which Genera submitted a revised assessment of Consumables, Spare Parts and Capital Spare Parts, pursuant to the Energy Bureau's November 29th Resolution.

3. On February 26, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing* (“February 26th Resolution”). In the February 26th Resolution, the Energy Bureau informed that they had found that Genera satisfactorily reflected the Energy Bureau's direction, subject to certain reporting requirements listed in Attachment A to the February 26th Resolution.

4. The Energy Bureau, through the February 26th Resolution, approved the final version of the revised assessment of Consumables, Spare Parts, and Capital Spare Parts subject to the Quarterly Reporting Requirements established in Attachment A of the February 26th Resolution, and order Genera to file the foregoing Quarterly Reports within 45 days after the end of each quarter.

5. In compliance with the February 26th Resolution, Genera respectfully submits the First Quarter (“Q1”) Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026 as Exhibit A to this Motion.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera's Q1 Report on Consumables, Spare Parts, and Capital

² See, Section 4.2 (j) of the LGA OMA.

Spare Parts for FY2026 as Exhibit A herein; and **deem** Genera to be in compliance with the February 26th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day November of 2025.

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CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to the following counsel of record:

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In San Juan, Puerto Rico, this 17th day of November of 2025.

/s/ Stephen David Romero Valle
Stephen David Romero Valle

Exhibit A

Q1 Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026
(Attachment to GPR–PREB–NEPRMI20210014–20240226 #4 submitted in native form via email)

Docket Number: NEPR-MI-2021-0014

In Re: Determination on Genera's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing

RE: **FY26 - Q1 Report** - Maintenance and Repair Management of the Generation Units of the Puerto Rico Electric Power Authority

Attachment A

Planned Maintenance and Critical Component Replacement Program.

GPR-PREB-NEPRMI20210014-20240226 #1

1. Report on Genera's progress in achieving the Expected Results of Forced Outage Reduction: 32% to 15% as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.

Response:

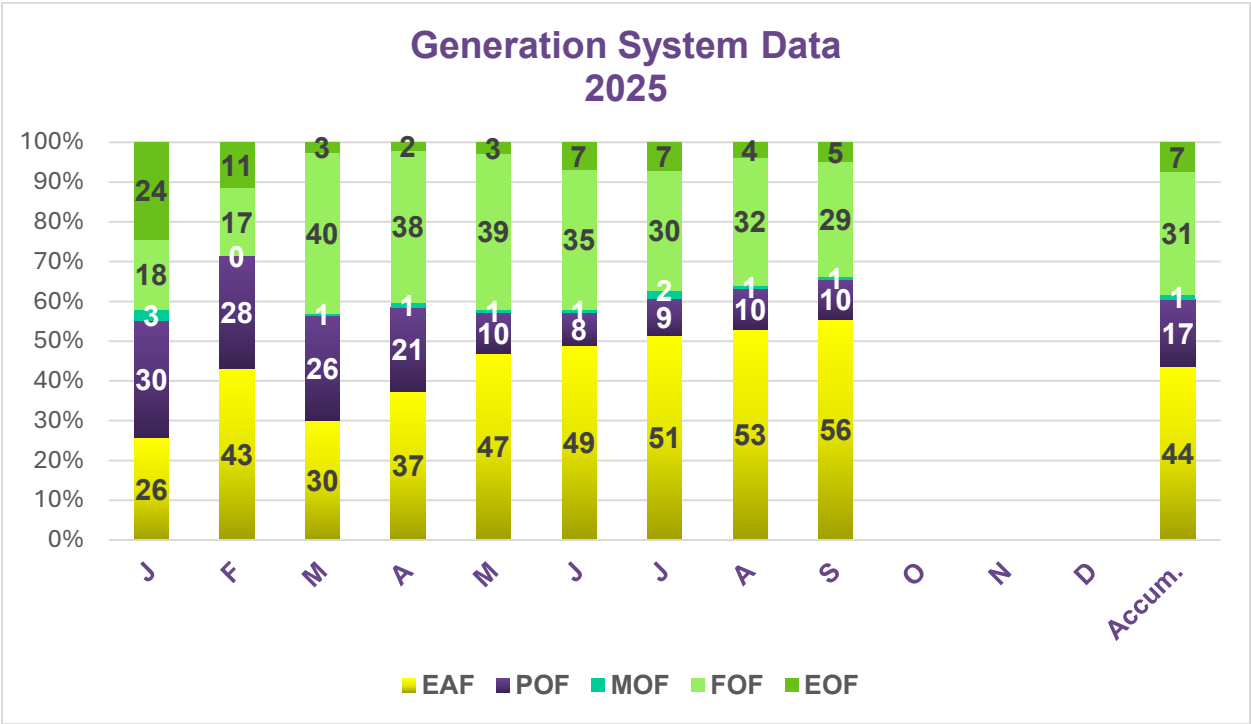
During Q1 of FY 2025-26, Palo Seco Unit 4 remained out of service until September 16. The unit was subsequently taken out of service again from September 17 through September 26 due to a generator rotor failure, during which repair activities were carried out. The unit returned to service on September 26.

Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.

The Key improvements were the following:

- The Equivalent Availability Factor (EAF) increased from 49% in June 2025 to 56% in September 2025, contributing to a reduction in load-shedding during the period.

- The Forced Outage Factor (FOF) decreased from 35% in June 2025 to 29% in September 2025, resulting in improved unit availability.
- San Juan Unit 9 was out of service from July 22 through July 24 for a total of 67.6 hours due to maintenance activities, including steam leak repairs and condenser cleaning.
- San Juan CT 5 and San Juan ST 5 were out of service on July 14 for 17.6 hours and 19.1 hours, respectively, due to condenser cleaning to improve unit efficiency.
- San Juan CT 5 and San Juan ST 5 were again out of service from August 16–20 for 76.6 hours and 81.4 hours, respectively, for condenser cleaning to improve unit efficiency.
- San Juan CT 5 was out of service from September 5–7 for 47.5 hours due to condenser cleaning to improve unit efficiency.
- San Juan ST 5 was out of service from September 5–8 for 61.9 hours due to condenser cleaning to improve unit efficiency.
- Note: A project is currently underway during FY 2025–26 to implement a continuous condenser cleaning system, which will eliminate the need for offline condenser cleaning. This initiative will contribute to improved unit efficiency.
- San Juan CT 6 underwent various inspections during September, including work on bearing #1 associated with the transmission torque converter.
- San Juan CT 6 was also out of service from September 20–22 for 55.7 hours to conduct uranine condenser testing, after which the required corrections were completed.



GPR-PREB-NEPRMI20210014-20240226 #2

2. Report on Genera's progress in achieving the Expected Results Increase in availability: 17% = 340 MW as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.

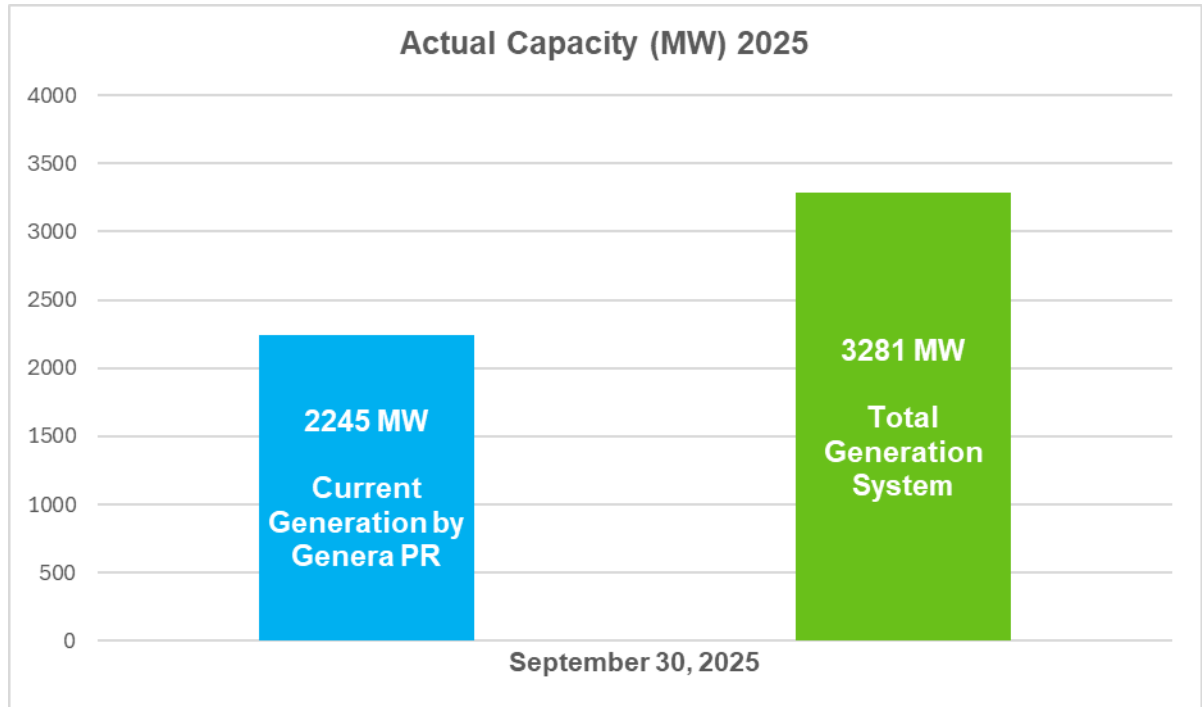
Response:

The EAF increased from 49% in June 2025 to 56% in September 2025, contributing to a reduction in load-shedding and improving overall unit availability.

As of September 30, 2025, the Total Generation System Availability was 3,281 MW, while the highest Peak Demand recorded during the quarter was 3,203 MW.

Generation limitations during the period were as follows:

- Costa Sur Unit 6 was limited by approximately 154 MW due to elevated differential pressure in the air heaters.
 - Palo Seco Units 3 and 4 were limited by approximately 222 MW.
 - San Juan TM Units 1, 8, and 10 were limited due to their operation on ULSD as a result of constraints in the LNG fuel supply (+15 MW).
 - San Juan TM Unit 5 remained out of service as a spare unit due to LNG fuel supply issues (+25 MW).
- San Juan TM Unit 7 experienced a forced outage (+25 MW).
- Palo Seco TM Unit 3 was limited due to operation on ULSD resulting from LNG supply issues (+8 MW).



GPR-PREB-NEPRMI20210014-20240226 #3

3. Report on Genera's success in accurately predicting and achieving scheduled Regular Maintenance Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

Response:

Key scheduled outages and delays during the first quarter include:

- Palo Seco Unit 4 had a forced outage on August 8, 2023. The unit returned to service on September 26, 2025, and is currently in the commissioning and testing phase.
- Aguirre Unit 2 experienced a forced outage in February 2025 and returned to service in July 2025. The outage included repairs to the excitation system and the installation of a new AVR system.
- The Palo Seco Unit 4 maintenance outage, originally scheduled for completion in July 2025, was extended through September 2025 due to additional findings identified during the generator installation.
- The Combined Cycle Steam Unit 1 maintenance outage, initially planned to conclude on June 30, 2025, has been extended to December 2025 as a result of additional findings related to the condenser circulating water pump and condenser system.

GPR-PREB-NEPRMI20210014-20240226 #4

1. Report on Genera's success in accurately predicting and achieving scheduled Critical Component Replacement Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

Response:

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226 #4.

GPR-PREB-NEPRMI20210014-20240226 #5

2. Report on incidents of unplanned outages in Genera's Generation Fleet, including reason for outage, duration of outage, generation plant unit experiencing the outage, and how the duration of the outage was affected by availability or unavailability of Consumables, Spare Parts, and Capital Spare Parts.

Response:

See attachments:

- GPR-PREB-NEPRMI20210014-20240226 #5 - July
- GPR-PREB-NEPRMI20210014-20240226 #5 - August
- GPR-PREB-NEPRMI20210014-20240226 #5 - September

II. Consumables Spare Parts and Capital Spare Parts Inventory

C1. Genera Supply Chain

GPR-PREB-NEPRMI20210014-20240226 #C1

Detail and quantify the results of Genera's Supply Chain strategy used to achieve priority changes and improve warehouse operations and control of spare parts, consumables, and equipment inventory, reflecting Prudent Utility Practice, using the "lean" and "agile" systems identified in Genera's July 26 Motion, Appendix A.

Response:

Genera continued implementing its lean and agile supply chain strategy during the semester to strengthen warehouse operations and improve control spare parts, consumables, and equipment inventory. The Warehouse Department maintained its practice of issuing monthly reports documenting end of month inventory levels, warehouse transactions, material movement, and activities related to proper storage, efficient handling, inventory controls, and waste reduction.

To further support this strategy, the IT Department is developing new Power BI dashboards to customize the Asset Suit platform for Genera's operational needs. These enhancements will improve visibility, reporting accuracy, and overall efficiency in warehouse and inventory management.

C2. Reliability Centered Management Program

GPR-PREB-NEPRMI20210014-20240226 #C2

Detail the status of the development and implementation of Genera's Reliability Centered Management Program and Genera's success in accurate scheduling and tracking programs to manage inventory for the three identified major elements of Preventive Maintenance, Predictive Maintenance, and Corrective Maintenance.

Response:

Genera continued advancing its Reliability Centered Management Program during the semester, focusing on the three major elements of preventive, predictive, and corrective maintenance. All maintenance activities are being scheduled and tracked through the Asset Suite Enterprise Asset Management system, consistent with the Plant Maintenance Manual, vendor technical documentation, and sound engineering practices.

During the period, Genera continued updating the equipment hierarchy, refining the stock catalog based on the warehouse audit, and preparing the integration of Smart CBM technologies (vibration, infrared thermography, and ultrasound) to maintain accurate equipment history and improve reliability tracking. The Inventory Module (WMS) also continues to support control of spare parts, consumables, and equipment locations across all facilities.

In support of these efforts, the IT Department is developing new process systems and KPI tools within Asset Suite to enhance maintenance tracking, reliability reporting, and warehouse management functionality.

C3. Managing Obsolete Parts

GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(a)(i)

3. Detail Genera's success in managing obsolete spare parts in the short, medium, and long term based on the following timeframe:

a. 6 months

i. Status of the detailed inventory audit.

Response:

All obsolete material and listing is located at Aguirre warehouse.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(a)(ii)

ii. Status of the plan to eliminate redundancies, cancel standing orders, return, sell or write off obsolete spare parts and equipment.

Response:

Genera continued working with the Operations team to identify essential materials for the Legacy Generation Assets and to classify surplus obsolete spare parts for proper disposal. Because these assets are movable property owned by PREPA, Genera is developing a process consistent with applicable laws and regulations to govern their disposal and write-off.

To reduce redundancies, Warehouse is reviewing inventory movement history, adjusting stock levels, and canceling standing orders for items that do not require long lead times or are already available in inventory or under Master Purchase Agreements. Warehouse also continues to track procurement requests to ensure alignment with actual inventory and avoid unnecessary purchases.

As part of its efforts to streamline processes and strengthen inventory controls, Genera implemented a requirement that all material requests, codified or not, must be processed through the Warehouse. This approach allows for better tracking, improved accountability, and reduced redundancies. Additionally, the IT Department is developing new reports within Asset Suite to further support these objectives and enhance visibility into material usage.

GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(i)**b. 12 – 24 months**

i. Division of warehouse inventory into the identified categories.

Response:

Genera continued advancing the division of warehouse inventory into the identified categories. The Warehouse Team is refining purchasing and storage practices by categorizing parts and equipment to ensure proper organization and improve efficiency. To support this effort, the Asset Suite platform is being updated to incorporate all category classifications, providing greater visibility into material requests and purchase orders. Warehouse personnel are also organized by category to better understand operational needs, react to market conditions, and reduce unnecessary or emergency purchases.

As part of the ongoing improvements, Genera is reviewing its inventory category listings to reclassify materials with duplicated descriptions in the inventory management system. Additionally, obsolete materials from the four warehouses are being consolidated and relocated to a dedicated warehouse at the Aguirre Power Plant, pending PREB and P3A authorization for final disposition. This process includes the packing, identification, and labeling of all related containers and pallets.

GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(ii)

- ii. Tracking and monitoring the proper demand forecasting tool for spare parts, equipment, and consumables.

Response:

Genera continued strengthening the tracking and monitoring of demand forecasting for spare parts, equipment, and consumables during the semester. Weekly coordination meetings between Warehouse, Operations plant managers, and Procurement support planning for scheduled outages and repairs, allowing the teams to prioritize orders, monitor inventory movement, and ensure timely re-stocking of essential materials.

Efforts to enhance Asset Suite also continued, including the incorporation of item categories with minimum thresholds that trigger purchase flags. These improvements will support more accurate forecasting by providing clearer visibility into stock levels and material usage. In parallel, Genera and LUMA continue working on the segregation of Asset Suite data and servers, which will enable Genera to expand and improve reporting capabilities.

As part of these efforts, the IT Department is developing new Power BI reporting platforms, and daily monitoring of data continues through the front end of Asset Suite. These tools will further enhance demand forecasting, visibility of lead times and prices, and understanding of plant-specific needs.

GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(iii)

iii. Implementation of automatic requisitions when the minimum quantity is reached.

Response:

Genera continued advancing the steps required to implement automatic requisitions when minimum quantity thresholds are reached. As part of the transition away from the Shared Services Agreement, the segregation of the Asset Suite database and system administration functions will allow Genera to gain full control of the platform. This will enable the development of customized programming, enhanced system capabilities, and potential integration with other tools to automate requisitioning and reduce manual intervention once minimum stock levels are triggered.

During this quarter, Warehouse personnel focused on cleaning and correcting duplicated descriptions within the system and ensuring proper classification of categories. Once these corrections are completed, Genera will proceed with reprogramming the automated requisition functionalities to support accurate, system-driven replenishment.

GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C3(c)(i)**C. Replacement Parts**

- i. Assessment and identification of replacement parts and development of procurement plan with existing suppliers.

Response:

Genera continued assessing and identifying replacement parts during the semester by coordinating closely with Warehouse, Operations, and Procurement to determine essential material needs for the Legacy Generation Assets. Inventory movement history and stock levels are being reviewed and adjusted to ensure that replacement parts are available to support scheduled maintenance and outage work.

As part of this process, Warehouse is refining item classifications in Asset Suite, correcting duplicated descriptions, and organizing materials into the appropriate categories to support clearer visibility and more accurate procurement planning. Weekly coordination meetings between Warehouse, Operations, and Procurement also support prioritization of orders and alignment of replacement part needs with existing supplier capabilities.

In parallel, Genera expanded its supplier base, registering 33 new suppliers between August and October to ensure multiple sourcing options and strengthen procurement planning for replacement parts.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(c)(ii)

- i. Process of seeking alternative parts and suppliers for existing replacement parts.

Response:

Genera continued expanding and diversifying its supplier base to identify alternative parts and vendors for existing replacement needs. Between August and October, 33 new suppliers were registered, supporting the ongoing effort to ensure multiple sourcing options, improve availability of replacement parts, and strengthen supply chain resilience.

GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C3(d)

d. Identify and quantify the space and cost savings for all categories.

Response:

All orders are placed within the estimated amount and in accordance with the approved budget to ensure the planned savings are achieved.

C4. Obtaining Best Part Price

GPR-PREB-NEPRMI20210014-20240226-ATTA #C4

Report on Genera's success in obtaining the best part price through competitive bidding and achievement of the goals of "best quality part fit" and "best part price" through the network source process.

Response:

Genera has consistently achieved competitive pricing and quality standards through a structured sourcing process that prioritizes transparency and market competitiveness. All major procurements are conducted through formal bidding using Power Advocate ERP, ensuring multiple qualified suppliers are evaluated based on both price and technical criteria.

Through this process, Genera has successfully secured the best part prices while maintaining the highest standards of quality and fit. The supplier network continues to expand, enhancing competition and driving cost efficiency. As a result, the company has met and, in several cases, exceeded its goals of obtaining the best quality part fit and the best part price across multiple categories.

Genera has consistently achieved competitive pricing and quality standards through a structured sourcing process that prioritizes transparency and market competitiveness. All major procurements are conducted through formal bidding using Power Advocate ERP, ensuring multiple qualified suppliers are evaluated based on both price and technical criteria.

Through this process, Genera has successfully secured the best part prices while maintaining the highest standards of quality and fit. The supplier network continues to expand, enhancing competition and driving cost efficiency. As a result, the company has met and, in several cases, exceeded its goals of obtaining the best quality part fit and the best part price across multiple categories.

C6. Warehouse Management Software

GPR-PREB-NEPRMI20210014- 20240226-ATTA #C6

- a. Detail and quantify Genera's implementation and use of a Computerized Maintenance Management System (CMMS) or Enterprise Asset Management (EAM) to optimize and integrate the maintenance operations of the power facilities.
- b. Report on the status of Genera's assessment of technology to use after December 31, 2023, when the shared services agreement including Asset Suite ends.

Response:

As part of this transition, Genera is assessing long-term technology options to determine whether Asset Suite 9 should remain in place or be replaced with a solution better aligned with the best utility practices. The IT Department is currently developing and customizing the systems to meet Genera's operational requirements.

C9. Critical parts

GPR-REB-NEPRMI20210014-20240226-ATTA #C9(a)

- a. Report on the status and success of Genera's plans to expedite orders for critical parts with quantity 0.

Response:

Genera continued prioritizing the identification and procurement of critical parts with zero on hand quantities. Weekly coordination meetings between Warehouse, Operations, and Procurement support the prioritization of these items, allowing the teams to expedite orders based on maintenance schedules, outage needs, and inventory movement.

Improvements to Asset Suite, including category classifications, minimum thresholds that trigger purchase flags, and ongoing corrections to duplicated descriptions, are strengthening visibility of critical parts that require immediate replenishment. Additionally, the registration of 33 new suppliers between August and October increased sourcing options, supporting Genera's ability to accelerate orders for critical materials.

Daily monitoring of inventory data through Asset Suite, combined with the IT Department's development of new Power BI reporting tools, is further enhancing Genera's ability to track, forecast, and expedite orders for critical parts with zero stock.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C9(b)

b. Identify any critical parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

Response:

After performing a forensic inventory of all the critical, mayor and minor parts, Genera implemented an action plan to replenish the warehouses. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

The parts were identified and classified based on units already out of service or scheduled for maintenance and which ones had priority. An assessment of the critical parts that could be purchased using federal funds was made. After assessing these variables, the Warehouse Department engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C10(a)

- a. Report on the status and success of Genera's plans to expedite orders for major and Minor Parts with quantity 0.

Response:

Please refer to answer GPR-REB-NEPRMI20210014-20240226-ATTA #C9(a).

GPR-PREB-NEPRMI20210014-20240226-ATTA #C10(b)

- a. Identify any Major and Minor Parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

Response:

Please refer to answer GPR-REB-NEPRMI20210014-20240226-ATTA #C9(a).

C11. Plan to address shortage of critical parts**GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(a)**

- a. Report on the status and success of Genera's plans to address shortage of critical parts requiring long lead times.

Response:

Genera has implemented alternative logistics strategies to mitigate the impact of long lead times and ensure operational continuity. Delivery time is used as a key evaluation criterion when sourcing materials identified as critical or time sensitive. The company continuously monitors inventory levels and coordinates proactive replenishment to maintain adequate stock and meet established performance metrics. These actions have strengthened supply chain resilience and reduced the risk of operational delays caused by parts shortages.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(b)

b. Report on the status and accuracy of projected timelines and cost estimates.

Response:

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226 #4.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(c)

c. Describe the effectiveness of procurement procedures.

Response:

Genera's procurement procedures have proven to be highly effective in ensuring transparency, compliance, and value creation across all sourcing activities. The process is guided by standardized policies that promote competitive bidding, supplier diversity, and adherence to regulatory and internal controls.

Each procurement event is carefully evaluated based on technical, financial, and delivery criteria to ensure that all awards are made in the best interest of operational efficiency and cost optimization. Continuous monitoring and process improvements have resulted in reduced lead times, improved supplier performance, and consistent alignment with corporate and regulatory objectives.

Overall, the procurement framework effectively supports Genera's commitment to accountability, fairness, and sustainable operational excellence.

C12. Procurement of spare parts with long lead times**GPR-PREB-NEPRMI20210014-20240226-ATTA #C12(a)**

- a. Report on the status and accuracy of identifying long lead time spares.

Response:

Please refer to answer GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(a).

GPR-PREB-NEPRMI20210014-20240226-ATTA #C12(b)

- a. Report on the status, details, and effectiveness of multi-faceted approach for:
- i. Long term agreements
 - ii. Make and hold
 - iii. Blanket PO
 - iv. Vendor-managed inventory
 - v. Consignment stocking

Response:**Long-Term Agreements:**

Long-term agreements are actively in place and function effectively to support maintenance, emergency response, and repair activities. These agreements ensure continuity of supply, stable pricing, and improved coordination with key suppliers for critical materials and services.

Blanket Purchase Orders (BPOs):

Blanket POs are also established and operating successfully to streamline recurring purchases related to maintenance, emergency needs, and repair work. This approach enables faster order processing, cost control, and alignment with approved budgets.

Vendor-Managed Inventory (VMI):

Vendor-managed inventory programs are being implemented to strengthen material availability for critical components. Under this model, suppliers maintain agreed stock levels at Genera's facilities, ensuring timely replenishment, reduced lead times, and improved operational efficiency.

C13. Synchronization of spare parts inventory with legacy power plants' repair schedules

GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)

- a. Report on the status of the Unit Maintenance Plan for Boilers and Turbo Generators being coordinated with LUMA.

Response:

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a).

GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)(i)

- i. Provide reasons for any maintenance delays and describe mitigating measures identified to reduce future and shorten existing delays.

Response:

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #3 & GPR-PREB-NEPRMI20210014-20240226 #5.

GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(b)

1. Report on accuracy of work packages including availability of parts, equipment, and design among the other designated components.

Response:

To support improvements, the IT Department is developing new Power BI reports, and inventory data is being monitored daily through the front end of Asset Suite to strengthen visibility and improve planning for work packages.

C14. Verification of spare part quantities as compared with inventory list**GPR-PREB-NEPRMI20210014-20240226-ATTA #C14**

Report on the status and accuracy of the extensive inventory audit at all facilities.

Response:

To strengthen accuracy and oversight, Genera maintains a contract with DCMC to perform daily inventories across all four warehouses using DCMC's dedicated inventory personnel. DCMC provides daily reports and promptly communicates any discrepancies to Genera's Logistics Manager, ensuring continuous monitoring and improved accuracy of inventory records.

C 15. Incomplete inventory information**GPR-PREB-NEPRMI20210014-20240226-ATTA #C15**

- a. Report on the status of eliminating current and future instances of missing information for critical and major items for Unit Cost, Quantity in Stock, Required Quantities and Total Cost.

Response:

The Warehouse Department is currently addressing system glitches to customize the Asset Suite 9 platform for Genera's operational use. Once the system is fully tailored to Genera's operational needs, warehouse supervisors will begin preparing a new catalog of items in coordination with operations personnel.

C16. Critical items out of stock**GPR-PREB-NEPRMI20210014-20240226-ATTA #C16**

Provide status on:

- a. Eliminating instances of critical items out of stock
- b. Actual impact of critical items out of stock on the repair schedule and stabilization of units.
- c. Evaluation of replacement equipment and alternative parts supplies.
- d. Planned outage scopes of work, resource mapping, and risks that could affect the reliable operation of the fleet power plants.

Response:

Warehouse generated requests for replenishment of materials and critical parts components are being prepared with operations personnel using asset suites master catalog document.

C 17. Genera's plan in the event of generating plant critical turbine failure**GPR-PREB-NEPRMI20210014-20240226-ATTA #C17**

Report on the readiness of Genera according to its plan in the event of critical turbine failure at any of the fleet power plants, including how any shortage or unavailability of critical parts that require long lead times is being addressed.

Response:

Over the past year, Genera has made progress in total generation capacity. This is the result of strategic projects implementing short-term repairs and maintenance work. Some examples include Aguirre 2, Palo Seco 3&4, Costa Sur 5 & 6, San Juan 5, among others. Genera is diligently working on having available MW to supply the power demand and support the stabilization of the power grid.

An increase in planned maintenance is key to keeping units working correctly, which helps reduce potential failures of critical parts. Having additional MW available helps Genera support the system in case of failure. If a unit is forced out of service, the generation fleet may still have the capacity to sustain the grid, preventing load-shedding events.

The Genera team is also assessing the conditions of the critical parts in the units and engaged in the procurement of critical components that, once installed, will improve the reliability of the fleet. These assessments allow for better planning and use of the unit. If Genera does not have sufficient stock in inventory, Genera is sourcing the parts from different suppliers, including refurbished if necessary. Additionally, Genera is reaching out to other utilities or businesses that may use the same system or have surplus in their warehouse that is still operational and in working conditions that can be purchased as spare part in case of an emergency or sudden failure.

C18. Benchmarks for Critical Spare Parts**GPR-PREB-NEPRMI20210014-20240226-ATTA #C18(a)**

- a. Report on Genera's success in developing and meeting benchmarks for availability of critical spare parts.

Response:

Genera has selected vendors for over 95% of the critical spare parts. Some critical spare part RFPs did not receive a response. For those cases, Genera is reviewing the technical specifications published and contacting vendors to understand the constraints.

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- b. Report on effectiveness and accuracy of Genera's process for determining whether inventory of critical and major parts is low and making sure adequate quantities are in place.

Response:

All stock items used by end users will automatically populate the replenishment window in Asset Suite. Warehouse supervisors review the suggested reorder list and prepare requisitions for any items that fall below the established maximum levels. Once approved, the requisitions are forwarded to Procurement, which initiates the bidding process and identifies the appropriate supplier to replenish materials for future operational needs.

Genera also maintains a cycle-counting process across all four warehouses to ensure accurate inventory records. This process enables the identification of items that are no longer in use and supports the correction or update of catalog descriptions as necessary, strengthening overall inventory accuracy and control.

Attachments to GPR-PREB-NEPRMI20210014-20240226 #5

- GPR-PREB-NEPRMI20210014-20240226 #5 - July
- GPR-PREB-NEPRMI20210014-20240226 #5 – August
- GPR-PREB-NEPRMI20210014-20240226 #5 - September

July 2025

Unit	Description	Out Date	In Date	Duration (Hrs)	Corrective Action
Aguirre 2	Main transformer	11-Jul-25	17-Jul-25	152.48	Braids and cables were replaced where the parasitic currents land on the ground.
Aguirre CC 1-2	Other exhaust problems	22-Jul-25	22-Jul-25	1.2	Spread programming was changed to original, recommended by General Electric.
Aguirre CC 2-4	Other exhaust problems	22-Jul-25	22-Jul-25	1.9	Spread programming was changed to original, recommended by General Electric.
Cambalache 2	Gas Turbine Control System - internal and termination wiring	12-Jul-25	12-Jul-25	5.87	Cabling and connectors were repaired. Threadlocker was applied to the threads of the speed sensor connectors.
Costa Sur 5	Platen superheater	4-Jul-25	8-Jul-25	115.25	Damaged boiler tubes were repaired.
Palo Seco 3	Burners	21-Jul-25	21-Jul-25	4.67	Burners were cleaned and put back on service.
San Juan 9	Instrument Air compressors	24-Jul-25	25-Jul-25	5.10	Fault in the instrument was corrected and unit reincorporated into the system.
San Juan 9	Waterwall (Furnace wall)	27-Jul-25	28-Jul-25	24.23	Fault in the valve was corrected and unit reincorporated into the system.
San Juan 9	Other main steam system problems	28-Jul-25	28-Jul-25	1.33	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Other combustor problems	9-Jul-25	10-Jul-25	40.1	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Other exciter problems	11-Jul-25	11-Jul-25	4.0	Fault was corrected and unit reincorporated into the system.

San Juan CT 6	Boiler Water Condition	17-Jul-25	19-Jul-25	29.2	Fault was corrected and unit delivered to the TOC available.
San Juan CT 6	Other exciter problems	24-Jul-25	24-Jul-25	9.3	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Other exciter problems	24-Jul-25	24-Jul-25	1.3	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Other exciter problems	25-Jul-25	25-Jul-25	10.7	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Other exciter problems	26-Jul-25	26-Jul-25	9.1	Fault was corrected and unit reincorporated into the system.
San Juan CT 6	Boiler Water Condition	28-Jul-25	29-Jul-25	30.2	Fault was corrected and unit reincorporated into the system.

August 2025

Unit	Description	Out Date	In Date	Duration (Hrs)	Corrective Action
Aguirre 2	Economizer piping	8-Aug-25	12-Aug-25	92.81	Repaired economizer recirculation line.
Aguirre 2	Main transformer	15-Aug-25	15-Aug-25	9.73	The cables that land on the ground were changed and connected to another part of the mesh.
Aguirre 2	Burner management system	21-Aug-25	21-Aug-25	3.48	The main fuse of the Burner Management System was changed.
Aguirre 2	Desuperheaters / Attemperators	31-Aug-25	31-Aug-25	8.48	High pressure heater purchase in process.
Aguirre CC 1-1	Vibration of the turbine generator unit	2-Aug-25	2-Aug-25	2.7	Vibrations sensor of Bearing 2 was changed.
Aguirre CC 2-1	Other 400-700 volt problems	1-Aug-25	1-Aug-25	1.5	The megger was applied to the large equipment, the breaker was left off and the power was normalized. The unit was synchronized due to system needs.
Aguirre CC 2-1	Other 400-700 volt problems	6-Aug-25	6-Aug-25	13.7	Bars and breaker in unit 2-1 and 2-2 were changed.
Aguirre CC 2-2	Fuel piping and valves	3-Aug-25	4-Aug-25	28.9	The affected section was changed.
Aguirre CC 2-2	Fuel filters	4-Aug-25	4-Aug-25	2.7	Fuel line was welded.
Aguirre CC 2-2	Fuel filters	4-Aug-25	4-Aug-25	2.1	Tubes were welded.
Costa Sur 6	Air heater fouling (regenerative)	1-Aug-25	3-Aug-25	70.35	Cleaning of air heater baskets was performed.
Costa Sur 6	Other main steam valves	4-Aug-25	5-Aug-25	27.1	The breakage was repaired and valve replaced.
Mayaguez 3A	DC instrument power battery chargers	28-Aug-25	30-Aug-25	37.75	The dead battery was replaced.
San Juan CT 6	Other fire protection system problems	14-Aug-25	25-Aug-25	268.3	Failure in fire protection system was corrected and unit reincorporated to the electrical system.
San Juan CT 6	Inspection	26-Aug-25	28-Aug-25	41.9	Bearing inspection requested by contrator. Failure was corrected and unit reincorporated to the electrical system.
San Juan CT 6	Inspection	28-Aug-25	31-Aug-25	73.1	Bearing inspection requested by contrator in progress.
San Juan ST 5	Control valves	20-Aug-25	20-Aug-25	6.1	Failure in control valve was corrected and unit reincorporated to the electrical system.
San Juan TM 1	Miscellaneous plant auxiliary process and services instrumentation and controls	6-Aug-25	7-Aug-25	15.85	FCV-2001 (Gas Fuel Metering VLV) funtional tests were carried out, review and simulation at sensors were reviewed and simulated to the control loop, and the connections on the control cards were tightened.
Palo Seco TM 2	Fuel nozzles/vanes	4-Aug-25	16-Aug-25	282.27	Fuel nozzles in the combustion chamber were replaced and an axial wash was performed on the turbine. After the interventions, the operational stability of the unit was verified and the Temperature readings were normalized.

September 2025

Unit	Description	Out Date	In Date	Duration (Hrs)	Corrective Action
Palo Seco 3	400-700 volt protection devices	1-Sep-25	1-Sep-25	8.85	Electrical work on bar 480V.
Palo Seco 3	Other exciter problems	9-Sep-25	9-Sep-25	6.63	Corrections done on relays of ground field and press release.
Palo Seco 4	Major overhaul	17-Sep-25	26-Sep-25	231.12	Leak corrected.
Mayaguez 4B	Thrust bearings	23-Sep-25	23-Sep-25	1.38	Power Turbine Thrust bearing balance was calibrated.
Mayaguez 4B	Thrust bearings	26-Sep-25	26-Sep-25	1.87	All sensors of the Power Turbine Thrust bearing balance were calibrated.
Aguirre 2	Generator voltage control	29-Sep-25	29-Sep-25	2.37	The system (AVR) was resetted.
San Juan 9	Induced draft fans	23-Sep-25	27-Sep-25	97	Work completed on bearing induced draft fan (IDF) to fix vibrations.
San Juan CT 5	Other fire protection system problems	11-Sep-25	12-Sep-25	18.7	Correction on fire protection system.
San Juan ST 5	Other fire protection system problems	11-Sep-25	12-Sep-25	21.2	Correction on fire protection system.
Costa Sur 6	Boiler recirculation pumps - motors	26-Sep-25	28-Sep-25	44.27	Boiler pump motor was replaced and unit synchronized.
Costa Sur 6	Other boiler recirculation problems	28-Sep-25	29-Sep-25	20.52	Flow meter was calibrated and unit synchronized.
Palo Seco TM 1	Bearings	12-Sep-25	13-Sep-25	1.72	Inspection and cleaning of Magnetic Chip Detector D to determine bearing conditions.
San Juan TM 2	Other miscellaneous balance of plant problems	17-Sep-25	17-Sep-25	13.43	Repairs on the lift pump, correcting the gas leak.
San Juan TM 7	Other service water problems	21-Sep-25	30-Sep-25	215.75	The FCV-2019 was replaced and the driver was calibrated.
Palo Seco TM 3	Other exciter problems	9-Sep-25	9-Sep-25	4.72	Micronet was resetted, initiated the startup for the unit, and synchronized successfully.
San Juan TM 1	Stator windings, bushings, and terminals	7-Sep-25	7-Sep-25	4.6	Wire harness replaced with spare harness.
Palo Seco 1-2	Hydraulic oil system piping/valves	12-Sep-25	12-Sep-25	2.8	The valve was replaced and the unit was synchronized. Unit online and available.

Attachment

GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)



UNIT MAINTENANCE PLAN

BOILERS AND TURBO-GENERATORS

August 15, 2025

UNID.	CAP MV	2025												2026											
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SJ CT 5	160							Turbine Inspection																	
SJ STM 5	60																								
SJ CT 6	160					Major Overhaul									Outage to install ST Rotor										
SJ STM 6	60														Mayor Overhaul										
SJ 7	100													Major Overhaul											
SJ 9	100														Major Overhaul & Enviromental										
PS 3	216															Env.Maint									
PS 4	216	■	■	■	■	■	■	■	■	■				Generator fault repair + mayor	outage environmental							Env.Maint.			
CS 5	410					Baskets & Env.Maint. 9-2025															Env.Maint.				
CS 6	410							Baskets & Env. Maint. 11-2025																	
AG 1	450		■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
AG 2	450		■	■	■	■	■	■	Generator Failure Repair and AVR									Baskets & Env.Maint.			Gen. Rotor failure (Reviending) / AH Baskets				
CC Vap I	96	■	■	■	■	■	■	■	■	■															
CC Vap II	96	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Cambalache 2	82																								
Cambalache 3	82						■	■	■	■	■	■	■	Repairs on vane carrier after B-type inspection.											
Eco CT 1	176								Annual Mairt.																
Eco CT 2	176																								
Eco Vap	214																								
AES 1	254																								
AES 2	254																Annual Maint.								

Legend	
Current Progress	
Planned Maintenance	
Forced Outage	■
TOC provides information	